

PRIVACY POLICY

Datenschutzerklärung | analytics.7seas-360.com

Version 1.0 | March 2026

1. Controller

Invictus Advisory UG (haftungsbeschränkt)

Hohe Bleichen 8, 20354 Hamburg, Germany

CEO: Jochen Pirklbauer

Email: privacy@7seas-360.com

Registration: HRB 189195, Amtsgericht Hamburg

VAT ID: DE451911513

2. Overview

This Privacy Policy explains how we collect, use, store, and protect personal data when you visit our website analytics.7seas-360.com and use the 7SEAS 360 platform. We process personal data in compliance with the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG).

3. Data We Collect

3.1 Website Visitors (without login):

- IP address (anonymised after processing)
- Browser type and version, operating system
- Date and time of access
- Referring URL

Legal basis: Art. 6(1)(f) GDPR (legitimate interest in website security and optimisation).

3.2 Quotation Requests (Pricing Page):

- Contact details: name, email, phone, job title/function
- Company details: company name, legal form, address, registration number, VAT ID
- Service preferences: tier selection, carrier setup, add-ons, TEU volume

Legal basis: Art. 6(1)(b) GDPR (pre-contractual measures at request of data subject).

3.3 Platform Users (authenticated):

- Login credentials: username, hashed password
- Access logs: IP address, login timestamps, pages visited, reports generated
- Business data uploaded by the customer (shipment data, contract data, targets)

Legal basis: Art. 6(1)(b) GDPR (contract performance); Art. 28 GDPR (processing on behalf of controller).

4. Purpose of Processing

We process personal data exclusively for the following purposes:

- Providing and operating the 7SEAS 360 analytics platform
- Processing quotation requests and generating contracts
- User authentication and access control
- Security monitoring and fraud prevention

- Compliance with legal obligations

We do **not** use personal data for profiling, automated decision-making, or marketing purposes without explicit consent.

5. Data Storage and Retention

5.1 All data is stored on dedicated servers operated by **Hetzner Online GmbH** in **Nuremberg, Germany**. No data is transferred outside the EEA.

5.2 Retention periods:

- Website access logs: 90 days
- Quotation requests: 35 days (active), then archived for 10 years (tax/commercial law)
- Platform user accounts: duration of contract + 30 days for data export
- Invoices and billing records: 10 years (German tax law, AO/HGB)

6. Data Sharing

We do not sell personal data. We share data only with:

- **Hetzner Online GmbH** (hosting provider, Germany)
- **Google LLC** (email processing via Gmail, SCCs in place)
- **Carrier APIs** (only shipment reference data, no personal data)
- **Legal/tax advisors** (as required by law)

7. Your Rights

Under the GDPR, you have the right to:

- **Access** your personal data (Art. 15)
- **Rectification** of inaccurate data (Art. 16)
- **Erasure** ('right to be forgotten') (Art. 17)
- **Restriction** of processing (Art. 18)
- **Data portability** in machine-readable format (Art. 20)
- **Object** to processing (Art. 21)
- **Lodge a complaint** with the Hamburg Commissioner for Data Protection (HmbBfDI)

To exercise your rights, contact: privacy@7seas-360.com

8. Cookies

8.1 The 7SEAS 360 platform uses only **technically necessary session cookies** for authentication and session management. No tracking cookies, analytics cookies, or third-party cookies are used.

8.2 As only strictly necessary cookies are used, consent under the ePrivacy Directive is not required.

9. Security Measures

We implement the following technical and organisational measures:

- TLS 1.2+ encryption for all data in transit
- Password hashing with bcrypt/werkzeug
- Role-based access control per user
- Regular security code audits (Bandit, dependency scans)

- Server hardening and firewall configuration
- Access logging with IP tracking

10. Changes to This Policy

We reserve the right to update this Privacy Policy. Changes will be published on this page with an updated version number and date. Registered platform users will be notified of material changes via email.

11. Contact

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Phone: +49 (0) 40 [to be added]